

**ROBERT E. ATKINSON**  
CHAPTER 7 BANKRUPTCY TRUSTEE  
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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:

ALL PURPOSE SECURITY, LLC  
*dba* VESTA FORCE SECURITY

Debtor.

Case No: 25-12229-mkn  
Chapter 7

**MOTION TO ABANDON  
PROPERTY OF THE ESTATE**

**[Property: 2022 Jeep Cherokee]**

[LR 9014.1 Negative Notice Procedures]

**TO: ALL PARTIES IN INTEREST and THEIR COUNSEL OF RECORD:**

**NOTICE OF OPPORTUNITY TO OBJECT AND SET FOR HEARING**

Pursuant to LR 9014.1, the court will consider this motion, objection, or other matter without further notice of hearing unless a party in interest files an objection within twenty-one (21) days from the date of service of this paper. If you object to the relief requested in this paper, you may file your objection at the bankruptcy clerk's office located in Las Vegas at the United States Bankruptcy Court, 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, or in Reno at the United States Bankruptcy Court, 300 Booth Street, Reno, NV 89509, and serve a copy on the movant and any other appropriate persons.

**It is the duty of the objecting party to timely set the objection for a hearing and properly notice all parties in interest. If you do not file an objection within the time permitted, an order granting the requested relief may be entered by the court without further notice or hearing.**

Chapter 7 trustee Robert E. Atkinson (“Trustee”) hereby moves to abandon the following property of the estate (the “Property”):

- 2022 Jeep Cherokee, VIN # 1C4PJMMX2ND510571

Section 554(a) of the Bankruptcy Code provides, “after notice and a hearing, the trustee may abandon any property of the estate that is burdensome to the estate or that is of inconsequential value and benefit to the estate.” 11 U.S.C. § 554(a). Satisfying either prong of Section 554(a) is sufficient to grant abandonment relief.

In this matter, the Trustee asserts that the Property is of inconsequential value and benefit to the bankruptcy estate, and/or is burdensome to the bankruptcy estate, for the following reason:

- The Property is subject to a loan that exceeds its current value, leaving no equity available for liquidation for the benefit of the estate. Specifically, the Trustee has been provided and has reviewed two documents:
  - A Carmax offer valuing the vehicle at \$22,400.00, and
  - A current loan statement indicating that the amount owed on the car loan is \$26,819.14.

Because the loan exceeds the market value, no equity is available to liquidate.

Because at least one prong of Section 554(a) is satisfied, the Trustee asserts that cause exists to abandon the Property.

Bankruptcy Rule 6007 provides that a trustee may give notice of a proposed abandonment of property and seek Court review and approval, subject to the right of a party-in-interest to object. Fed. R. Bank. Pr. 6007(a). Therefore, the Trustee requests the Court’s approval to abandon the Property back to the Debtor.

Local Bankruptcy Rule 9014.1(a)(4) provides for negative notice procedures. Pursuant to that rule, the Trustee hereby gives notice of the proposed abandonment. Pursuant to LR 9014.1(b), the proposed order is attached as Exhibit 1.

WHEREFORE, the Trustee hereby gives notice of his intent to abandon the Property, and requests that the Court approve this abandonment.

# # # # #

DATED: May 29, 2025

By: /s/ Robert Atkinson  
ROBERT E. ATKINSON, *Trustee*

**EXHIBIT 1**  
**[Proposed Order]**

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8 **ROBERT E. ATKINSON**  
9 CHAPTER 7 BANKRUPTCY TRUSTEE  
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In re:

ALL PURPOSE SECURITY, LLC  
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Debtor.

Case No. 25-12229-mkn  
Chapter 7

**ORDER APPROVING  
ABANDONMENT**

The Court reviewed and considered the chapter 7 trustee's motion entitled MOTION TO ABANDON PROPERTY OF THE ESTATE [ECF # \_\_\_\_] (the "*Motion*").

No objection or opposition to the Motion was timely filed. For the reasons stated in the Motion, good cause appears to grant the requested relief.

**IT IS HEREBY ORDERED:**

1. The Motion is approved.
2. The following property is hereby abandoned, and is no longer property of the bankruptcy estate, effective as of the date of entry of this order:

- 2022 Jeep Cherokee, VIN # 1C4PJMMX2ND510571

**IT IS SO ORDERED.**

# # #

Respectfully submitted by:

/s/ Robert E. Atkinson

ROBERT E. ATKINSON

*Chapter 7 Trustee*

**CERTIFICATION re: RULE 9021**

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

- ☐ The court has waived the requirements set forth in LR 9021(b)(1).
- ☒ No other party appeared at the hearing or filed an objection to the motion.
- ☐ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below:
- ☐ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

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